

# CSM LEGAL, P.C.

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April 12, 2022

BY ECF

Judge Andrew L. Carter  
United States District Court Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: Martinez-Hernandez v. East Wingers Inc. et al.  
Case No. 17-cv-2176-ALC

Your Honor:

This office represents Plaintiffs Jose Alberto Martinez Hernandez, Roberto Julian, Agustin Valeriano, and Prixco Soriano (“Plaintiffs”). We write jointly with Defendants pursuant to the Order of April 6, 2022 regarding the stipulation dismissing Roberto Julian’s claims.

Plaintiff Julian has stated that he does not wish to pursue his claims and has requested that they be dismissed without prejudice. As this dismissal is not the result of a settlement agreement, it should not be subject to *Cheeks* approval.

Regarding the consent judgment contemplating among remaining Plaintiffs and Defendants, counsel for the parties have agreed on a form of consent judgment and are working to review it with their respective clients.

We thank the Court for its time and consideration.

Respectfully submitted,

By: /s/Clela Errington

Clela A. Errington, Esq.  
CSM Legal, P.C.  
*Attorneys for Plaintiff*

cc: Kevin O’Donoghue, Esq.

